



Our reference: DOC19/871107-5
Date: 31/01/2020

The Proper Officer
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Mr Anthony Ko
Senior Environmental Assessment Officer

Dear Anthony,

**Proposed Snowy 2.0 - Segment Factory, Cooma – SSI-10034
Comments on response to submissions**

Thank you for providing the NSW Environment Protection Authority (EPA) with the opportunity to provide comment on the Response to Submissions (RTS) for the proposed Tunnelling Methodology (SSI-9208-MOD 2) received on 23 December 2019.

The EPA has assessed the RTS against the comments we provided on 6 November 2019 relating to noise and air. Please find attached our comments (Attachment 1) and recommended conditions of consent (Attachment 2) for the NSW Department of Planning, Industry and Environment's consideration.

Should approval for the proposed segment factory be received the proponent will need to apply to the EPA for an Environment Protection Licence (EPL) for the scheduled activity of "Concrete works". This EPL will be required for both the construction and operational phases of the proposed segment factory and can be applied for through the EPA's online portal *e-connect*.

Thank you for discussing this matter with the EPA. If you have any queries or wish to discuss this matter further, please contact Carlie Armstrong or Nigel Sargent on (02) 6229 7002 or via email to queanbeyan@epa.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'Matt Rizzuto'.

MATT RIZZUTO
Unit Head - South East Region
NSW ENVIRONMENT PROTECTION AUTHORITY

Phone 131 555
Phone 02 6229
7002

TTY 133 677, then
ask for 131 155

PO Box 622
QUEANBEYAN
NSW 2620

Level 3
11 Farrer Place
QUEANBEYAN NSW
2620 AUSTRALIA

[Queanbeyan@epa.nsw.gov.au](mailto:queanbeyan@epa.nsw.gov.au)
www.epa.nsw.gov.au
ABN 43 692 285 758

Attachment 1 Comments from Response to Submissions

The EPA has assessed the RTS against the comments we provided on 6 November 2019 relating to noise. From its assessment, the EPA notes that:

Noise impacts

- a) the justification regarding the land-use zoning at the sensitive noise receivers (R2, R18, R19 and R20) and appropriate assessment criteria is satisfactory;
- b) the proponent has committed to regularly consult with all noise impacted residences and manage any concerns;
- c) the proponent has committed to prepare a management plan to manage traffic noise impacts;

The EPA considers the above approach is appropriate for managing any potential noise impacts from the project.

Air impacts

- d) based on the information provided in the Air Quality Impact Assessment (AQIA; emission inventory, background levels and adopted assumptions), an approximate 10% reduction in traffic emissions is still insufficient to avoid the majority of the predicted 24-hour PM_{2.5} exceedances at the sensitive receivers near the project boundary;
- e) while the sensitive receivers are located within industrial-zoned land, the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (Approved Methods) defines a sensitive receiver as a location where people are likely to work or reside. This definition does not vary according to the zoning of the land;
- f) the background levels adopted in the AQIA were based on a synthetic profile of measurements taken from three monitoring stations in the ACT. The EPA notes that these measurements could be considered higher than the expected background levels in the vicinity of the project. However, section 5.1.3 of the Approved Methods provides guidance on dealing with elevated background concentrations and it states, “*a licensee must demonstrate that no additional exceedances of the impact assessment criteria will occur as a result of the proposed activity and that best management practices will be implemented to minimise emissions of air pollutants as far as is practical*”. Based on the information provided, the EPA does not consider that all reasonable and feasible measures are being considered to control particulate emissions from the site. For example, estimated PM_{2.5} emissions from diesel combustion from front-end-loaders (FEL) and forklifts (that account for approximately 32% of the total emissions) can be reduced by adopting better technologies with lower emissions;
- g) the obligation to minimise emissions of air pollutants as far as is practicable is also provided under section 128 of the *Protection of the Environment Operations Act 1997*;

The EPA considers that the issue of additional exceedances of the PM_{2.5} 24-hour average impact assessment criterion can be addressed through a consent condition requiring the proponent to identify and implement all feasible and reasonable particulate mitigation measures.

Phone 131 555
Phone 02 6229
7002

TTY 133 677, then
ask for 131 155

PO Box 622
QUEANBEYAN
NSW 2620

Level 3
11 Farrer Place
QUEANBEYAN NSW
2620 AUSTRALIA

Queanbeyan@epa.nsw.gov.au
www.epa.nsw.gov.au
ABN 43 692 285 758

Attachment 2

Recommended Conditions of Consent

The EPA recommends the following conditions of consent for the proposed project:

Conditions of approval

- 1) Prior to the commencement of operations, the proponent must prepare a study to investigate feasible and reasonable mitigation measures for reducing particulate matter emissions from the premises.
 - a. The report must:
 - i. Identify all particulate matter emission sources at the premises;
 - ii. Identify all mitigation measures implemented at the premises for each source identified in (i);
 - iii. Quantify particle emissions (TSP, PM₁₀, PM_{2.5}) from all sources identified in (i);
 - iv. For the most significant particulate matter emission sources identified in (iii), identify feasible and reasonable mitigation measures that could be implemented to reduce emissions;
 - v. Quantify the emission reductions that could be achieved with the implementation of feasible and reasonable mitigation measures identified in (iv); and
 - vi. Nominate a timeframe for the implementation of the feasible and reasonable mitigation measures identified

Licence conditions

- 2) The premises must be maintained in a manner that prevents and/or minimises the emission of air pollutants, including dust and fume, from the premises;
- 3) Activities occurring in or on the premises must be carried out in a manner that prevents and/or minimises the emission of air pollutants, including dust and fume from premises;
- 4) All internal roads up to the edge of the site boundary must be sealed. All haulage must be undertaken on sealed roads;
- 5) All incoming sand and aggregate must be stored in three-sided concrete bunkers;
- 6) The concrete batching plant processes (weigh hopper and central mixer) must be enclosed; and
- 7) All plant and equipment installed at the premises or used in connection with the licensed activity:
 - i. must be maintained in a proper and efficient manner; and
 - ii. must be operated in a proper and efficient manner.

Phone 131 555
Phone 02 6229
7002

TTY 133 677, then
ask for 131 155

PO Box 622
QUEANBEYAN
NSW 2620

Level 3
11 Farrer Place
QUEANBEYAN NSW
2620 AUSTRALIA

Queanbeyan@epa.nsw.gov.au
www.epa.nsw.gov.au
ABN 43 692 285 758